

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix of)
the ESTATE OF FRANK E. PAVLIS,)
Plaintiff,)

v.)

KEY COMMERCIAL FINANCE,)
LLC, KEY COMMERCIAL)
FINANCE PROPERTIES, LLC,)
EQUITY PROS, LLC, and MOBILE)
AGENCY, LLC,)
Defendants.)

C.A. No. 1:18-cv-01516-CFC/SRF

JUSTIN BILLINGSLEY and KEY)
COMMERCIAL FINANCE, LLC,)
Third-Party Plaintiffs,)

v.)

DEBORAH S. SKEANS and)
DARBIN SKEANS,)
Third-Party Defendants.)

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2020, upon consideration of the March 5, 2020 letter (“Discovery Dispute Letter”) from Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis (the “Estate of Mr. Pavlis”) regarding a discovery dispute between the parties, any response to the Discovery Dispute Letter filed by Defendants Key Commercial Finance, LLC, Key Commercial Finance Properties, LLC, Equity Pros, LLC, and Mobile Agency, LLC (collectively “Defendants”), and the March 12, 2020 teleconference, **IT IS ORDERED** as follows:

1. The Estate of Mr. Pavlis' request that Defendants produce additional responsive documents is **GRANTED**;

2. Within twenty (20) days from the date of this Order Defendants shall produce all documents responsive to Requests 1-20, 23-31, and 33-46 set forth in Plaintiff's First Set of Requests for Production of Documents, including, but not limited to the following categories of documents:

- Any documents related to the ownership, formation, operation, and leadership of the Defendant entities.
- Any notes, private placement memoranda, subscription agreements, and note purchase agreements or amendments—or drafts of those documents sufficient to show when they were created—evidencing any investment Mr. Pavlis made in specified entities.
- Complete financial documents that track the flow of funds from Mr. Pavlis to the Defendant entities, such as Defendants' bank statements, credit card statements, and other financial records.
- Metadata associated with specified documents.
- The "written investment agreement" between Mr. Pavlis and KCF expressly referenced in KCF's Funding Agreement with Allwest.
- Any documents evidencing communications between KCF and Mr. Pavlis, including any correspondence or investment documents exchanged between Defendants and Mr. Pavlis or Defendants' internal memoranda or files relating to any investments allegedly made by Mr. Pavlis.
- Any documents evidencing meetings between Mr. Billingsley and Mr. Pavlis, including calendar, diaries, or notes.

3. To the extent Defendants cannot produce additional documents responsive to any particular request because they do not have anything to produce, within twenty (20) days from the date of this Order Defendants shall amend their November 11, 2019 Objections and Responses to Plaintiff's First Set of Requests for Production of Documents to reflect that they do not have the documents requested.

J.